

Collective for Arts, Freedom, and Ecology
935 F ST
Fresno, CA 93706

RE: LPFM NRPM, Docket 99-25

Dear Federal Communications Commission,

My name is Vanessa Padilla from the organization Collective for Arts, Freedom, and Ecology (C.A.F.E) in Fresno, California. Our organization promotes a venue for and greater public awareness about the arts in Fresno; to provide a space for community events; and to advocate for solutions to Fresno's environmental problems. We wanted to comment regarding the recently proposed LPFM and translator rule changes.

From our understanding, the FCC is proposing to either process or not process these pending translator applications from going back to 2003 on a market-by-market basis. To our dismay, the pending rulemaking includes Fresno as a "process" market. We think the FCC should reconsider for good reason.

First, we counted roughly over 140 pending translator applications in the Fresno area. This appears to be more than any market in the United States except for maybe New York and Philadelphia. Except Fresno is much smaller in area in population and square miles than the "no process" markets.

We consulted with a broadcast professional regarding the availability of frequencies in central Fresno. We found that if all of the pending translator applications are processed as planned, there will be no open channels for LPFM in central Fresno. Even more disappointing, it appears that one person and one entity will be beneficiaries of most of the channels: Robert J. Connelly, Jr. has 124 applications pending in the Fresno and Tulare markets, and Big Broadcasting, Inc. has 24 applications pending in the Fresno area. The last remaining FM channels in Fresno could be almost all held in a duopoly between two entities, with no future LPFM channels to be applied for.

Although we applaud the FCC for opening up frequencies in many cities, we believe the method in which they decide which markets need processed should be adjusted to better account for markets like Fresno, which will have no availability in the central city for LPFM once all the translators are processed here.

Sincerely,

Vanessa Padilla
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